

IN THE UNITED STATES OF AMERICA  
DISTRICT COURTS FOR THE STATE OF DELAWARECurris m. Collins } CIV ACT. NO.  
PLAINTIFF, } 05-739-SLR

v.

Berezansky  
WARNER RICK KEARNEY  
Sgt. T. CHANELLER ET ALCLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2006 AUG 31 PM 3:08  
RD scanned

## MOTION TO PRODUCE MEDICAL RECORDS REPORTS OF PLAINTIFF

1. PLAINTIFF Curris m Collins REQUESTS FIRST CORR/MEDICAL SERVICES OF SUSSEX CORR INST DR. Roberta Burn's "HEAD" OF THE MEDICAL DEPT TO PRODUCE MEDICAL RECORDS REPORTS OF PLAINTIFF Collins FROM THE DATE OF August 6, 2005 UP UNTIL NOW THE PRESENT DATE. THAT PLAINTIFF has BEEN ALLOWED TO PROCEED IN THE ABOVE CIVIL ACTION BEFORE THE Courts THAT PLAINTIFF Collins has SUFFERED SERIOUS LIFE THREATENING INJURIES DUE TO THE GANGING UP AND BEATING UP ON PLAINTIFF By CORRECTIONAL OFFICERS BEREZANSKY, S.G.T. CHANELLER, ET AL

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IN THE UNITED STATES  
DISTRICT COURT FOR THE  
"STATES OF DELAWARE"

PLAINTIFF IS ENTITLED TO  
HAVE COPIES OF HIS MEDICAL  
RECORDS REPORTS TO SHOW  
SUPPORT OF THESE LIFE  
THREATENING INJURIES.  
THAT PLAINTIFF WAS TRANSFERRED  
FROM 'SUSSEX CORR INST' S.C.I.  
TO DEL CORR CENTER (D.C.C.)  
Therefore, Plaintiff REQUESTS  
THE COURT'S TO ORDER PRODUCTION  
OF PLAINTIFF COLLINS MEDICAL  
REPORTS OF FIRST CORR MEDICAL  
SERVICES C.M.S. OF D.C.C.  
THAT PLAINTIFF IS STILL BEING  
TREATED FOR THE SERIOUS MED-  
ICAL INJURIES SUSTAINED IN  
THE NEAR DEATH BEATINGS  
OF SUSSEX CORR CENTER  
CORRECTIONAL OFFICERS  
PLAINTIFF HAS NAMED IN THIS  
INSTANT CIVIL ACTION  
WHEREAS PLAINTIFF PRAYS  
FOR RELIEF AND FOR THIS  
HONORABLE COURT TO GRANT  
PLAINTIFF MOTION TO PRODUCE  
MEDICAL RECORDS REPORTS

PAGE 3  
OF PLAINTIFF  
COLLINS MOTION  
TO PRODUCE MEDICAL  
RECORDS REPORTS ~~WITNESSES~~

Curtis Collins

Curtis Collins

S.B.I# #314128

D.C.C.

B.L.D.g# #21

TIER GU-3\*

1181 PADDOCK RD Smyrna  
DEL, 19977

DATE: 8-27-06

CERTIFICATE OF' 4  
SERVICE'S

I, CURTIS M COLLINS  
hereby CERTIFY THAT ON  
This 8 DAY OF 29-06  
I HAVE handED THIS MOTION  
TO PRODUCE MEDICAL RECORDS  
TO A DELAWARE CORR CENTER  
PRISON GUARDS TO PLACE  
SAID MOTION IN D.C.C.  
UNITED STATE'S MAIL SYSTEM  
IN A PRE-PAID ENVELOPE TO  
BE SENT TO THE DEL DISTRICT  
COURTS AND:

SCT. DR. ROBERTA BURNS

EBERKA Y. TROSS ESG. P.O. Box 500 GEORGETOWN  
(ID # 4506) DEI 19947

DEPUTY ATTORNEY GENERAL

DEPT. OF JUSTICE

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WILMINGTON, DE 19801 S.B.I 314128#  
ph# 302-577-8400 D.C.C. B.I.D. 9 21#  
Tier C-U-3#

FIRST CORR MEDICAL SERVICES 1181 PADDOCK RD.  
1575 MCKEE RD. SMYRNA, DE 19970  
DOVER DE 19904